

# **EXHIBIT C**

**From:** Michael Bloch <mbloch@kaplanhecker.com>  
**Sent:** Monday, July 1, 2019 8:32 PM  
**To:** eli.f.mosley@gmail.com  
**Cc:** Gabrielle E. Tenzer  
**Subject:** Sines v. Kessler  
**Attachments:** 287 - 2018.03.26 Order Denying Peinovich's Motion to Stay.pdf; 282 - 2018.03.20 Transcript of Telephonic Conference Call on March 16, 2018.pdf; 379 - 2018.11.13 Order Granting Plaintiffs' Motion to Compel.pdf; 383 - 2018.11.19 Order and Stipulation re Imaging.pdf; 440 - 2019.03.04 March. 03, 2019 Order.pdf; Discord - Template - AUTHORIZATION AND CONSENT TO DISCLOSE DATA.docx; Twitter - Template - AUTHORIZATION AND CONSENT TO DISCLOSE DATA.DOCX; Plaintiffs' First Set of Interrogatories 4827-2638-0891 v2.pdf; Plaintiffs' [Corrected] First Set of Document Requests.pdf

Mr. Kline:

We are writing to provide information and materials to help you comply with the Court's June 21 Order concerning the pending motion for sanctions against you. The June 21 Order references its previous orders that detail your obligations in discovery. Those orders are attached here for your convenience. (ECF Nos. 287, 379, 383, 440, and ECF No. 282, at 23-24.)

Regarding your discovery obligations, the June 21 Order requires, among other things, the following:

- Provide complete and accurate written answers or responses to Plaintiffs' First Set of Interrogatories and Requests for Production of Documents, as required by the Court's Order of March 26, 2108, ECF No. 224. Plaintiffs' First Set of Interrogatories and Requests for Production of Documents are attached.
- Give Plaintiffs' counsel a complete and accurate Stored Communications Act ("SCA") consent form allowing Discord to produce any discoverable documents or electronically stored information ("ESI") in response to Plaintiffs' subpoenas, as required by the Court's Order of November 13, 2018, ECF No. 379. A copy of the SCA consent that you must fill out is attached. Once you fill out the document, you must e-mail it from the e-mail address that is associated with the Discord account to [sca@bsfilp.com](mailto:sca@bsfilp.com). If you had or have more than one Discord account that contained potentially relevant documents, you must fill out a consent form for each account.
- Complete consent forms giving Plaintiffs' counsel access to any other social media accounts (e.g., Facebook, Twitter, Gab) that you used to communicate about the Events at issue in this lawsuit, regardless of whether those accounts have been disabled, suspended, or deleted. We have attached to this email an authorization form from Twitter that will allow data to be recovered from suspended or disabled accounts and sent to a third-party vendor for imaging.
  - Please complete the attached consent form. Once the form is complete, please submit a request through the privacy form at <https://help.twitter.com/forms/privacy>. In the section of the form entitled, "**Please enter the specific information you are requesting:**", you must do two things:

(a) specify what content and data you are requesting (which should be identical to the data requested in the consent form). Specifically, the data you should request is as follows: Profile Data, Followers, Following, Tweets (and retweets), Replies, Notifications, Messages (Direct Messages or “DMs”), Any other items we would expect to find if we were viewing your live twitter account with full access and control.

(b) list the discovery vendor’s email address as the email address where the content and data should be sent ([bwilliams@idsinc.com](mailto:bwilliams@idsinc.com) and [kkim@idsinc.com](mailto:kkim@idsinc.com)). (Note that in the section entitled, “**The email address associated with your Twitter account**”, the account-holder must enter the email address associated with their suspended Twitter account -- not the discovery vendor’s email address.)

- It is important that the consent form is submitted via email before the privacy form request is submitted. After Twitter receives and validates both the paper consent form and the privacy form request, Twitter will email any requested and reasonably available content and data to the third-party discovery vendor.
- Comply immediately with each of the following provisions in the Stipulation and Order for the Imaging, Preservation and Production of Documents, ECF No. 383 (“Imaging Order”), as required by the Court’s Orders of November 19, 2018, ECF No. 383 and March 4, 2019, ECF No. 440:
  - Execute the Third-Party Discovery Vendor contract. That contract will be sent to you by the third-party vendor via e-mail.
  - Complete and provide to Plaintiffs’ counsel the Certification Form attached as Exhibit A to the Imaging Order, ECF No. 383, at 16. That document is attached.
  - Make available to the Third-Party Discovery Vendor for imaging and collection any Electronic Devices or Social Media Account identified in the Defendant’s Certification Form. For any questions, contact Ken Kim at [kkim@idsinc.com](mailto:kkim@idsinc.com).

If we can further assist in your compliance with the Court’s orders regarding your discovery obligations, feel free to contact me at this address.

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